

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

IN RE:	§	CASE NO. 21-21038
	§	
SANFORD KEITH AMEY,	§	CHAPTER 13
	§	
Debtor.	§	

DEBTORS' RESPONSE TO BEACON FUNDING CORPORATIONS  
MOTION FOR RELIEF FROM STAY REGARDING EXEMPT PROPERTY

TO THE HONORABLE JUDGE MARVIN ISGUR:

COME NOW, Sanford K. Amey, Debtor herein, and files this Response to Beacon Funding Corporations Motion for Relief From Stay and would show the Court as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Paragraph 4 is admitted.
5. Paragraph 5 is admitted.
6. Paragraph 6 is admitted.
7. Debtor cannot admit or deny Movant's estimate of the value of the property.
8. Paragraph 8 is admitted.
9. Paragraph 9 is denied.
10. Paragraph 10 is admitted.
11. Paragraph 11 is admitted.
12. Paragraph 12 is admitted.
13. Paragraph 13 is admitted.
14. Paragraph 14 is a request for relief and does not require an admission or denial.

15. Paragraph 15 is a request for relief and does not require an admission or denial.
16. Paragraph 16 is admitted.
17. Paragraph 17 requires neither an admission nor denial.
18. Paragraph 18 is admitted.
19. Debtor would state that he currently has insurance or is in the process of securing insurance regarding the aforementioned property.

Wherefore, Debtor prays that this Court deny Movant's Motion for Relief From Stay and grant Debtors all other relief to which they may be entitled.

Respectfully submitted,

Adelita Cavada Law  
Attorney for Debtors

/s/ Adelita Cavada

Adelita Cavada, TBN 24084882

10004 Wurzbach Rd. #159

San Antonio, Texas 78230

P: (210) 880-5299

F: (833) 851-3160

E: adelita@adelitacavadalaw.com

CERTIFICATE OF SERVICE

On this date, a true and correct copy of the foregoing was served to all parties of interest by CM/ECF notice, email notice, or by first class mail to the address listed below.

Date: 03/05/2021

*/s/ Adelita Cavada*

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Adelita Cavada

Beacon Funding Corporation  
c/o Sidney H. Scheinberg  
1201 Elm Street, Suite 1700  
Dallas, Texas 75270

Chapter 13 Trustee

US Trustee